

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

AT&T SERVICES, INC., AT&T MOBILITY,
LLC, and AT&T CORP.,

Defendants.

Case No. 2:23-cv-00397-JRG-RSP

JURY TRIAL DEMANDED

**DECLARATION OF KRISTOPHER DAVIS IN SUPPORT OF
PLAINTIFF HEADWATER RESEARCH LLC'S REPLY IN SUPPORT OF ITS
MOTION TO STRIKE CERTAIN OPINIONS OF AT&T REBUTTAL EXPERT NENAD
MEDVIDOVIC**

I, Kristopher Davis, declare and state as follows:

1. I am a member of the State Bar of California, an attorney at the firm of Russ August & Kabat, and counsel of record for Plaintiff Headwater Research LLC in the above-captioned action. I submit this declaration in support of Plaintiff's Reply in Support of its Motion to Strike Certain Opinions of AT&T's Rebuttal Expert Nenad Medvidovic. I have personal knowledge of the facts set forth herein, and if called upon to testify, could and would testify competently thereto.

2. Exhibits 1-9 were previously submitted with Headwater's opening brief (*see* Dkt. 136).

3. Attached as Exhibit 10 is a true and correct copy of Excerpts from Final Jury Instructions contained in Volume 4 of the trial transcript in *Headwater Research LLC v. Samsung Elecs. Co.*, No. 2:22-cv-00422-JRG-RSP, dated January 16, 2025.

4. Attached as Exhibit 11 is a true and correct copy of the Notice of Mootness regarding Sleeping and Deep Sleeping features filed in *Headwater Research LLC v. Samsung Elecs. Co.*, No. 2:22-cv-00422-JRG-RSP, dated May 31, 2024.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 30, 2025, at Los Angeles, California.

/s/ Kristopher Davis
Kristopher Davis

CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2025, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF System per Local Rule CV-5(a)(3).

/s/ Kristopher Davis
Kristopher Davis